



# State of Wisconsin

## LEGISLATIVE REFERENCE BUREAU

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STEPHEN R. MILLER  
CHIEF

February 18, 2011

## MEMORANDUM

**To:** Representative Barca

**From:** Joseph T. Kreye, Sr. Legislative Attorney, (608) 266-2263

**Subject:** Technical Memorandum to **2011 AB 20** (LRB-0800/1) **by DOR**

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We received the attached technical memorandum relating to your bill. This copy is for your information and your file.

If you wish to discuss this memorandum or the necessity of revising your bill or preparing an amendment, please contact me.

## **MEMORANDUM**

February 14, 2011

**TO:** Joseph Kreye  
Legislative Reference Bureau

**FROM:** Rebecca Boldt  
Department of Revenue

**SUBJECT:** Technical Memorandum on AB 20 (LRB 0800/1) – Make Angel and Early Stage Seed Credits Refundable

The Department has the following technical concerns with the above-referenced bill:

- Since under the bill the credit is made refundable, sec. 71.08(1) should be amended to include the credits under sections 71.07(5b)(d)4. and (5d)(d)5. in the list of credits not considered when computing minimum tax. If this is not done, a person who receives the refundable credit and who is subject to minimum tax would have the minimum tax increased by the amount of the credit which would mean there would be no benefit from the credit.
- Sections 3, 6, 12, and 17 of the bill refer to s. 71.28(4)(e), (g), and (h). The reference to par. (e) should be deleted. Paragraph (e) applies to the carry-over of unused credits and is not needed as the credit is refundable.

If you have any questions regarding this technical memorandum, please contact Michael Oakleaf at 261-5173 or via email at [Michael.oakleaf@revenue.wi.gov](mailto:Michael.oakleaf@revenue.wi.gov).

cc: Rep. Barca